

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**Tidewater Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Chesapeake Hardwood Products, Inc.  
201 Dexter Street West, Chesapeake, Virginia  
Permit No. VA-60851

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Chesapeake Hardwood Products, Inc. has applied for a Title V Operating Permit for its plywood paneling facility located at 201 Dexter Street West, Chesapeake.

Engineer/Permit Contact:\_\_\_\_\_ Date:\_\_\_\_\_

Air Permit Manager:\_\_\_\_\_ Date:\_\_\_\_\_

Regional Permit Manager:\_\_\_\_\_ Date:\_\_\_\_\_

Attachment A: minor NSR permits of 12/22/97 and 02/09/2000

## **FACILITY INFORMATION**

### Permittee

Chesapeake Hardwood Products, Inc.  
P.O. Box 1188, Chesapeake, VA 23327-1188

### Facility

Chesapeake Operating Facility  
201 Dexter Street, West

AIRS ID No. 51-550-00056

## **SOURCE DESCRIPTION**

SIC Code: 2435 – Flatwood plywood paneling products.

The source is a flatwood paneling facility with five production lines and six possible paneling products. The Echo line was modified in 1997 for the production of two types of products.

**Echo Line:** Vinyl Laminated Product Processes--all of equipment associated with grooving; applying adhesives, groove spray, vinyl, and barrier coat; and drying of vinyl plywood “laminated” paneling products.

Pre-filled Product Processes--all the equipment associated with applying primer and filler topcoat plus drying of plywood “pre-filled” paneling products. This line configuration allows only one of the possible two products to be under production—necessary equipment is operated for selected product.

**Chesapeake and Style Grain Print lines:** Plywood “printed” paneling processes--all the equipment associated with edge sanding; scuffing; applying filler, basecoat, floodcoat, ink, topcoat, and sealer; and drying of plywood “printed” paneling products. Both lines can operate simultaneously.

**Paper Laminate Line:** Plywood paper laminated paneling processes--all of equipment associated with grooving; applying adhesives, groove spray, paper, and barrier coat; and drying of paper plywood “laminated” paneling products

**UV Line:** all the equipment associated with sanding and applying ultra violet (UV) topcoat plus drying of plywood UV paneling products.

Miscellaneous other operations are conducted involving plywood.

**Cut to Size Operations:** A separate building houses beam saws, tenor saws, nose & groove saws, and computer operated saws that cut plywood sheets into furniture fill pieces (draw sides, bottoms, etc.) for shipment to furniture manufacturers. No coatings are applied to such furniture pieces in this building.

**Woodhog:** This equipment grinds all scrap wood, wooden pallets, and damaged paneling products into wood chips for sale as boiler fuel.

The facility is a Title V major source of VOCs and HAPS. This source is located in an attainment area for all pollutants. Parts of the facility are permitted under minor NSR permits issued on 12/22/97 for the Echo Line and 02/09/2000 for the UV Line.

## **COMPLIANCE STATUS**

The facility is inspected at least once per year and is in compliance.

# EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Process A: Echo Line Plywood Paneling Products</b>							
Echo Line	2	Vinyl Laminated Product Processes. 1994	15,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-2	PM/PM-10	(02/14/94 and modified) 12/02/97
Echo Line	2	Pre-filled Product Processes. 1997	12,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-2	PM/PM-10	12/02/97
<b>Process B: Plywood Paneling Print Products</b>							
Chesapeake Line	2	Print Product Processes. 1967	53,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-2	PM/PM-10	N/A
Style Grain Line	1	Print Product Processes. 1967	57,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-1	PM/PM-10	N/A
<b>Process C: Plywood Paneling Paper Laminated Products</b>							
Paper Laminate Line.	1	Paper Laminated Product Processes. 1970	53,000 sq ft/hr	Wheelabrator Frye, 6P Model 120 Ultrajet, 1972	BH-1	PM/PM-10	N/A
<b>Process D: Plywood Paneling UV Products</b>							
UV Line	4	UV Coating Production Processes. 2000	14,000 sq ft/hr	MAC 144. Mph 153, 2000	BH-4	PM/PM-10	02/09/2000
<b>Process E: Cut to Size Plywood Products (60,000 pieces/day for the entire complex)</b>							
Cut to Size	3a	Plywood Furniture Piece Production Processes. 1969	30,000 pieces/day	Wheelabrator Frye, 6P Model 120 Jet III, 1975	BH-3	PM/PM-10	N/A
Cut to Size	3b	Plywood Furniture Piece Production Processes. 1969	30,000 pieces/day	Pneumafil, Reverse Air II Model 13.5-460-12, 2000	BH-5	PM/PM-10	N/A
<b>Process F: Wood Chips</b>							
Woodhog	5	Wood Grinder, Montgomery Industries, Model 63PM-KC. 1972	1.5 ton/hr	Water mist, 1972	WH-1	PM/PM-10	N/A

\*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

# **EMISSIONS INVENTORY**

Emissions are summarized in the following tables.

1999 Actual Emissions

	Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
Echo Line	1.3				
Chesapeake, Style Grain, UV, & Paper Laminate Lines	77.2				
Cut to Size					
Woodhog				4.0	
Insignificant units	78.5	0	0	4.0	5.0
Total	78.5	0	0	4.0	5.0

1999 Facility Hazardous Air Pollutant Emissions

Pollutant	Hazardous Air Pollutant Emission in Tons/Year
N/A	

**EMISSION UNIT APPLICABLE REQUIREMENTS**

- A. The Echo Line** has the following requirements from the 12/22/97 NSR permit:  
**Specific requirements that can be found in the Title V permit are listed for review. Other general permit requirements that are part of Title V boilerplate language are also listed to account for all permit requirements.**

Condition 1: Changes—used T-5 boilerplate language. See streamlined section.

Condition 2: Equipment to be constructed consists of

- wood paneling laminate/plywood fill line No.2

Condition 3: Particulate matter emissions from the laminate/plywood fill line No. 2 shall be controlled by a fabric filter. The fabric filter shall be provided with adequate access for inspection and shall be in operation when the sanding system is operating. The fabric filter shall be equipped with devices to continuously measure the differential pressure drop across the fabric filter. The monitoring device shall be installed in an accessible location and shall be maintained by the permittee that it is in proper working order at all times.  
(9 VAC 5-80-10 H and 9 VAC 5-50-260)

Condition 4: Testing--used T-5 boilerplate language. See streamlined section.  
(9 VAC 5-50-30 F)

Condition 5: The annual throughput of volatile organic compounds for all Echo Line production of laminate and pre-fill products shall not exceed 39.3 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.  
(9 VAC 5-80-10)

Condition 6: Emissions from the operation of the Echo Line shall not exceed the limits specified below:

Volatile Organic Compounds	24.3 lbs/hr	39.3 tons/yr
Hazardous Air Pollutants (as VOC)		
Xylene	8.6 lb/hr	10.8 tons/yr

(9 VAC 5-50-180 and 9 VAC 5-50-260)

Condition 7: Visible emissions from the fabric filter servicing the laminate/plywood fill line No. 2 shall not exceed five (5)% opacity as determined by EPA Method 9 (reference 40 CFR 60. Appendix A).  
(9 VAC 5-50-20)

Condition 8: Notifications—not needed. See streamlined section.

Condition 9: The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

(i) Annual material balance of all products used on the laminate/fill line No.2 (coatings, adhesives, etc.), calculated monthly as the sum of each consecutive twelve (12) month period.

(ii) Material Safety Sheets for all materials used on laminate/fill line No.2 processes that display the VOC % and HAPS % by weight.

(iii) Annual VOC and HAPS throughputs and emissions for the laminate/fill No. 2 line, calculated monthly as the sum of each consecutive twelve (12) month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50)

Condition 10: Permit revision –used T-5 permit boilerplate language. See streamlined section.

Condition 11: Entry—used T-5 permit boilerplate language. See streamlined Section.

Condition 12: If, for any reason, the permitted facility or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the portion of the facility which is subject to the provisions of 9 VAB 5-60-60 et seq. (hazardous pollutants) shall be shut down safely and expeditiously, and portions of the facility which is subject to 9 VAC 5-50-180 shall be shut down immediately upon request of DEQ.

Second part of Condition 12: Malfunction reporting—used T-5 boilerplate language. See streamlined section.

(9 VAC 5-20-180)

Condition 13: The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
- b. Maintain an inventory of spare parts. The permittee shall maintain records of training provided that includes names of trainees, date of training, and nature of training.  
(9 VAC 5-50-20 E)

Condition 14: The permittee shall have available written operating procedures for related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written instructions. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall retain records of training provided including names of trainees, date of training and nature of training.  
(9 VAC 5-50-20 E)

Condition 15: Construction deadline—not needed. See streamlined section.

Condition 16: Ownership—used T-5 boilerplate language. See streamlined section.

Condition 17: information--used T-5 boilerplate language. See streamlined section.

Condition 18: Copy of permit--used T-5 boilerplate language. See streamlined section.

**B. The Echo Line** has the following applicable requirements from the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air pollution Control:

Para 9 VAC 5-40-4480: Since no specific VOC content limit for protective topcoats used on the laminated vinyl paneling was listed in the 12/22/97 permit, 9 VAC 5-50-10 D requires new sources to follow all existing source standards (Chapter 40) and new source standards (Chapter 50) when more stringent than new source permits standards (Chapter 80 permits). The VOC limit is 3.8

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pounds per gallons of topcoat, excluding water, as  
applied..



- C. **The Plywood Print Products (Chesapeake & Style Grain Lines)** have the following applicable requirements from the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air pollution Control:

Para 9 VAC 5-40-4930: VOC emissions from the operations of each printed plywood products line, the Chesapeake line and Style Grain line, shall not exceed 6.0 lbs per 1000 square feet of paneling coated.

Para 9 VAC 5-40-80: Visible emissions from each fabric filter stack (stacks 1 & 2) shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed (60)% opacity. This condition applies at all times except during startup, shutdown and malfunction.

- D. **The Plywood Paper Laminate Line** has the following applicable requirement from the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air pollution Control:

Para 9 VAC 5-40-260:  $E = 4.10P^{0.67}$

E = particulate emission rate in lb/hr

P = process rate in tons/hr

Para 9 VAC 5-40-80: Visible emissions from the fabric filter stack (stack 1) shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed (60)% opacity. This condition applies at all times except during startup, shutdown and malfunction.

- E. **The UV Line** has the following requirements from the 02/09/2000 NSR permit: Specific requirements that can be found in the Title V permit are listed for review. Other general permit requirements that are part of Title V boilerplate language are also listed to account for all permit requirements.

Condition 1: **Changes**—used T-5 boilerplate language. See streamlined section.

Condition 2: **Equipment List:**

Equipment to be installed on the Chesapeake (UV) plywood paneling line at this facility consists of:

- one MAC 144 sanding system rated at 14,000 square feet per hour with fabric filter

Previously installed and existing equipment at the facility consists of:

- one Chesapeake (UV) plywood paneling line coating system rated at 14,000 square feet per hour (9 VAC 5-80-10 A)

Condition 3: **Emission Controls** - Particulate matter emissions from the MAC 144 sanding system shall be controlled by a fabric filter. The fabric filter shall be provided with adequate access for inspection and shall be in operation when the sanding system is operating.  
(9 VAC 5-50-260)

Condition 4: **Emission Controls** - Volatile organic compounds emissions from the Chesapeake (UV) plywood paneling line shall be controlled by using ultraviolet activated curing coatings with no volatile organic compound content. The UV coating system shall be provided with adequate access for inspection.  
(9 VAC 5-50-260)

Condition 5: **Monitoring Devices** - The fabric filter shall be equipped with devices to continuously measure the differential pressure drop across the fabric filter. The monitoring device shall be installed, maintained, and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the sanding system is operating.  
(9 VAC 5-80-10 H, 9 VAC 5-50-20 C and 9 VAC 5-50-260)

Condition 6: **Monitoring Device Observation** - The device to continuously measure the differential pressure drop across the fabric filter shall be observed by the permittee with a frequency of not less than once per day to ensure good performance of the fabric filter. The permittee shall keep a log of the observations from the device that measures the differential pressure drop for the fabric filter.  
(9 VAC 5-50-50 H)

Condition 7: **Production** - The production of the Chesapeake (UV) plywood paneling line shall not exceed 23,000,000 square feet per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-10 H)

Condition 8: **Emission Limits** - Emissions from the operation of the Chesapeake (UV) plywood paneling line shall not exceed the limits specified below:

Particulate Matter	0.8 lbs/hr	0.7 tons/yr
PM-10	0.8 lbs/hr	0.7 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 2, 3, 4, and 7.  
(9 VAC 5-50-260)

Condition 9: **Visible Emission Limit** - Visible emissions from the fabric filter shall not exceed five (5) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed ten (10) percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.  
(9 VAC 5-50-80)

Condition 10: **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

- i. Annual production of the Chesapeake (UV) plywood paneling line, calculated monthly as the sum of each consecutive 12 month period.
- ii. The daily readings of the device to measure the pressure differential drop across the fabric filter.
- iii. Scheduled and unscheduled maintenance on the fabric filter.
- iv. Training records of personnel.  
These records shall be available for inspection by the DEQ and shall be current for the most recent five years.  
(9 VAC 5-50-50)

Condition 11: **Testing**--used T-5 boilerplate language. See streamlined section.

Condition 12: **Construction notifications**—not needed. See streamlined section.

Condition 13: **Permit invalidation**—not needed. See streamlined section.

Condition 14: **Right of Entry**--used T-5 boilerplate language. See streamlined section.

Condition 15: **Notification for Control Equipment Maintenance** - The permittee shall furnish notification to Director, Tidewater Regional Office of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to the shutdown. The notification shall include, but is not limited to, the following information:

1. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;
2. The expected length of time that the air pollution control equipment will be out of service;
3. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;
4. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

(9 VAC 5-20-180 B)

Condition 16: **Malfunction Notification**--used T-5 boilerplate language. See streamlined section.

Condition 17: **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.

(9 VAC 5-20-180 I)

Condition 18: **Maintenance/Operating Procedures** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- (b) Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- (c) Maintain an inventory of spare parts.
- (d) Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- (e) Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
- (f) Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.  
(9 VAC 5-50-20 E)

Condition 19: **Permit Suspension**--used T-5 boilerplate language. See streamlined section.

Condition 20: **Change of Ownership**--used T-5 boilerplate language. See streamlined section.

Condition 21: **Registration/Information Update**--used T-5 boilerplate language. See streamlined section.

Condition 22: **Permit Copy**--used T-5 boilerplate language. See streamlined section.

- F. The Cut to Size Plywood Products** has the following applicable requirements from the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air pollution Control:

Para 9 VAC 5-40-80: Visible emissions from each fabric filter stack (stacks 3a & 3b) shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed (60)% opacity. This condition applies at all times except during startup, shutdown and malfunction. Since the cut to size equipment was installed in 1969, both fabric filters receive the "existing source" opacity limits.

Para 9 VAC 5-40-2270: Woodworking particulate matter standard: Particulate matter must be must be collected and controlled before discharged into the air. If collected, PM emissions shall not exceed 0.05 grains per standard cubic feet of exhaust gas.

- G. The Woodhog Operations** has the following applicable requirements from the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air pollution Control:

Para 9 VAC 5-40-90: Fugitive dust/emissions standard: Reasonable precautions must be taken to preclude particulate matter from becoming airborne.

Para 9 VAC 5-40-80: Visible emissions from the woodhog filter stack (stack 5) shall not exceed twenty (20)% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed (60)% opacity. This condition applies at all times except during startup, shutdown and malfunction.

Para 9 VAC 5-40-2270: Woodworking particulate matter standard: Particulate matter must be must be collected and controlled before discharged into the air through the use of duct work and collectors or other devices, as approved by the board.

## Monitoring

### A. Echo Line

The VOC emissions from the coating application system and the fabric filter are the two systems that require active monitoring. Some monitoring requirements are satisfied with adequate recordkeeping. VOC emissions are monitored on monthly basis. VOCs per gallon for each vinyl laminate topcoat are monitored on a coating by coating basis. The fabric filter pressure device will be monitored daily and visible emissions/opacity monitored weekly.

1. Fabric Filter: The fabric filter (BH-2) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. The differential pressure drop shall be read and recorded at least once each calendar day that the Echo Line operates. Any pressure drop less than 1.0 inch or greater than 4.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.
2. The permittee shall check the Echo Line fabric filter stack (Stack 2) at least once each calendar week (Monday-Sunday) during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to reduce the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average is equal to or greater than five (5) percent, the VEE shall continue for one hour from initiation on the stack.
3. The permittee shall monitor monthly hours of operations of the Echo Line and of all materials (coatings, adhesives, etc.) used on the Echo Line. From a material balance of all products used on the Echo Line and Material Safety Data Sheet (MSDS) for the products, the permittee shall calculate the monthly and annual VOC and HAPS emissions except as required by Conditions III.B.4 and III.B.5. If VOC and HAPS content are given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12- month period. The monthly hours of operations for the Echo Line shall be used with monthly calculations of VOC and HAPS emissions to calculate hourly emissions to show compliance with Condition III.A.4.
4. If any monthly monitoring (as required in Condition III.B.3) indicates that VOC emissions are equal to or greater than 50% of the allowable limit in Condition III.A.4, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacture's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in throughput calculations. Quarterly testing may be discontinued after actual coating VOC emissions are below 50% of the allowable limit in Condition III.A.4 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacture's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
5. If any monthly monitoring (as required in Condition III.B.3) indicates that HAPS emissions are equal to or greater than 50% of the allowable limit in Condition III.A.4,



the HAPS content of each VOC material used shall be determined the next calendar quarter using Reference Method 311 (40 CFR 63, Appendix A) and such determined HAPS content shall be used for the purpose of calculating throughput and emissions. Testing shall be conducted by the permittee or the supplier may provide a manufacture's certificate of HAPS content of the batch as supplied for each VOC material formulation received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 311 test results. The most recent test results for each formulation shall be used in throughput calculations. Quarterly testing may be discontinued after actual HAPS emissions are below 50% of the allowable limit in Condition III.A.4 for three consecutive months. If quarterly testing is discontinued, the HAPS content determined in the latest test or manufacture's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.

6. The permittee shall monitor all Material Safety Data Sheets (MSDS) for materials used on Echo Line for protective topcoat on the vinyl laminated products and record the volatile organic compound weight per gallon as applied of protective top coat to show compliance with Condition III.A.5 for each protective top coat except as required by Condition III.B.7. If VOC content is given as a range, the maximum value shall be used.
7. If any monthly monitoring (as required in Condition III.B.6.) indicates that VOC emissions are equal to or greater than 50% of the allowable limit in Condition III.A.5, the VOC content of such topcoat shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such VOC determined content shall be used for the purpose of calculating throughput and emissions. Testing shall be conducted by the permittee or the supplier may provide a manufacture's certificate of VOC content of the batch as supplied for each VOC material formulation received. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results or manufacture's certificate for each formulation shall be used in throughput calculations. Quarterly testing may be discontinued after actual topcoat VOC emissions are below 50% of the allowable limit in Condition III.A.5 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacture's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.

**8. Plywood Print Lines (Chesapeake & Style Grain)**

The VOC emissions from the coating application system and the fabric filters are the systems that require active monitoring. Other requirements are satisfied with adequate recordkeeping. VOC emissions per 1000 sq ft of paneling are monitored monthly. Fabric filter pressure devices monitored daily and visible emissions/opacity monitored weekly.

1. Fabric Filters: Each fabric filter (BH-1 & BH-2) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The devices shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. The differential pressure drop for each fabric filter unit associated with Chesapeake and Style Grain lines shall be read and recorded at least once each calendar day that the line is operating. Any pressure drop less than 1.0 inch or greater than 4.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.
2. The permittee shall check the Chesapeake and Style Grain lines fabric filter stacks (stacks 2 and 1) at least once each calendar week (Monday-Sunday) of operations during daylight hours for visible emissions for at least six minutes. If visible emissions are noted from the either stack or both stacks, maintenance shall be performed on the fabric filter to reduce the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack(s) for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average is five (5) percent or greater for stack 2 when the Echo Line is operating, the VEE shall continue for one hour from initiation on the stack; otherwise, if the VEE exceeds ten (10) percent for stack 2, the VEE shall continue for one hour from initiation on the stack. If the VEE exceeds ten (10) percent for stack 1, the VEE shall continue for one hour from initiation on the stack
3. The permittee shall monitor monthly production (in thousands of square feet) and all materials (coatings, adhesives, etc.) used on the Chesapeake and Style Grain Print Lines. Each month, from a material balance of all products used and the Material Safety Data Sheet for the products, the permittee shall calculate the VOC emissions per 1000 square feet to show compliance with Condition IV.A.4, except as required by Condition IV.B.4. If VOC contents on the MSDS are given as a range, the maximum value shall be used.

3. If any monthly monitoring (as required in Condition IV.B.3) indicates that VOC emissions are equal to or greater than 50% of the allowable limit in Condition IV.A.4, the VOC content of each material shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such determined VOC content shall be used for the purpose of calculating throughput and emissions. Testing shall be conducted by the permittee or the supplier may provide a manufacture's certificate of VOC content of the batch as supplied for each VOC material formulation received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results shall be used in throughput calculations. Quarterly testing may be discontinued after actual VOC emissions are below 50% of the allowable limit in Condition IV.A.4 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacture's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.

**B. Plywood Paper Laminate Line**

The fabric filter and grooved paper laminated plywood throughput are the items that require active monitoring.

1. Fabric Filter: The fabric filter (BH-1) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. The differential pressure drop for the fabric filter associated with the Paper Laminate Line shall be read and recorded at least once each calendar day that the line is operating. Any pressure drop less than 1.0 inch or greater than 4.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.
2. The permittee shall check the Paper Laminate Line fabric filter stack (stack 1) at least once each calendar week (Monday-Sunday) during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to reduce the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds ten (10) percent, the VEE shall continue for one hour from initiation on the stack.
4. The permittee shall monitor and record monthly throughput of grooved and non-grooved products on the Paper Laminate Line.

5. The production throughput, fabric filter monitoring, and other recordkeeping requirements is sufficient to show compliance with the PM limit:

$$E = 4.10P^{0.67}$$

E = particulate emission rate in lb/hr

P = process rate in tons/hr

The Paper Laminate Line only has particulate emissions when the groover is used to make a grooved paper laminated plywood paneling product—groover can be on or off as required by the product.

With a max rated production of 6.0 tons/hr on the Paper Laminate Line, the allowed PM emissions are 13.6 lb/hr from the General Process Rule (Rule 4-4) . The groover has an estimated uncontrolled PM emissions of 1.96 lb/ton of paneling X 6.0 tons/hr = 11.8 lb/hr—in-compliance with PM standard. A fabric filter at 99% control efficiency is then used before the Paper Laminate Line air is exhausted (11.8 lb/hr X 0.01 = 0.1 lb/hr). There is reasonable compliance assurance with the PM standard as long as monitoring is being done to ensure the fabric filter system is working correctly. The permittee will keep records on groover emission factors, production, and fabric filter efficiency to calculate emissions upon request to show compliance with the PM standard.

### C. UV Plywood Products

The fabric filter and plywood throughput are the items that require active monitoring. If the system is maintained properly, the opacity is within permit limits, and throughput are maintained within permit limits, the PM emissions should be within the prescribed permit limits. Other requirements are satisfied with adequate recordkeeping. Plywood throughputs are monitored monthly. Fabric filter pressure device monitored daily and visible emissions/opacity monitored weekly.

1. Fabric Filter: The fabric filter (BH-4) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. The differential pressure drop for the fabric filter for the UV Line shall be read and recorded at least once each calendar day that the line is operating. Any pressure drop less than 1.0 inch or greater than 4.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.
2. The permittee shall check the UV Line fabric filter stack (stack 4) at least once each calendar week (Monday-Sunday) during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, maintenance shall be performed on the fabric filter to reduce the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds five (5) percent, the VEE shall continue for one hour from initiation on the

stack.

3. The permittee shall monitor and keep records of the monthly production of UV paneling products (in thousands of square feet) to show compliance with Condition VI.A.3.

#### **D. Cut to Size Plywood Products**

The fabric filters are the only system that requires active monitoring. If the fabric filters are maintained properly and opacity is within reasonable limits, the PM emissions should be within the prescribed PM standards. Each fabric filter pressure device will be monitored daily and visible emissions/opacity monitored weekly.1. Fabric Filters: Each fabric filters (BH-3 & BH-5) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The devices shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. The differential pressure drop for each fabric filter for the Cut to Size Operations shall be read and recorded at least once each calendar day that Cut to Size processes are operating. Any pressure drop less than 1.0 inch or greater than 4.0 inches shall be noted as an upset. Any noted upset shall require immediate maintenance on the fabric filter to return the differential pressure drop to within its normal range of readings. A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit.

The permittee shall check the Cut to Size fabric filter stacks (stack 3a & 3b) at least once each calendar day during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack(s), maintenance shall be performed on the fabric filter to reduce the visible emissions. If visible emissions continue after maintenance actions, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds ten (10) percent, the VEE shall continue for one hour from initiation on the stack.

#### **E. Woodhog**

The woodhog uses an alternate system to an air collection system for particulate matter emissions control—water spray system in the woodhog at the point of grinding. With no air collection system used for particulate control to provide a steady air flow, the 9 VAC 4-40-2270 standard of 0.05 grains/scf can not be tested. The woodhog water system will be monitored daily and the opacity monitored once per week. Once the woodhog has generated the chips, control of the possible fugitive emissions is very important. The wood chip truck loadout area will be monitored daily.

1. Woodhog water mist system: The permittee must check the woodhog water mist turn-on/off valve and the results recorded at least once each calendar day that the woodhog is operating.
2. The permittee shall check the woodhog stack (stack 5) at least once each calendar week (Monday-Sunday) during daylight hours of operations for visible emissions for at least six minutes. If visible emissions are noted from the stack, the water flow to the woodhog water mister must be checked. If visible emissions continue after the water flow has been corrected, a visible emissions evaluation (VEE) shall be immediately conducted on the stack for at least six minutes in accordance with Method 9 (40 CFR 60, Appendix A). If the VEE opacity average exceeds ten (10)

percent, the VEE shall continue for one hour from initiation on the stack.

3. The permittee shall check the woodhog chip truck loadout area at least once each calendar day during operations to ensure no spillage of wood chips. The results of the check on the truck loading area will be recorded.

## **Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and other activities required by the permit. These records include:

### **A. Echo Line**

1. Annual material balance of all products (coatings, adhesives, etc.) used on the Echo Line , calculated monthly as the sum of each consecutive twelve (12) month period.
2. Material Safety Data Sheet for all materials used on Echo Line processes that display the VOC % and HAPS % by weight. All required Method 24/24A, Method 311 test results or manufacture's certificates of VOC and HAPS batch content as supplied.
3. Fabric filter daily pressure differential device readings and any upsets, maintenance activities for upsets, visible emission checks, maintenance activities for reducing visible emissions, and any VEE conducted.
4. Emission calculations: hourly and annual VOC and HAPS emissions for the Echo Line.
5. Material Data Safety Sheet for all materials used on Echo Line for a protective topcoat on the vinyl laminated products that display the VOC % by weight. All required Method 24/24A results or manufacture's certificates of VOC batch content as supplied for topcoats.
6. Any malfunction that caused the Echo Line to be shut down and which is subject to the provisions of 9 VAB 5-60-60 et seq. (hazardous air pollutants) or any requests by DEQ to shut down the Echo Line and the permittee's actions on such occurrences.
7. Maintenance schedule, spare parts list, maintenance records of scheduled and unscheduled maintenance, and training records.

### **B. Plywood Print Lines (Chesapeake & Style Grain)**

1. Material Safety Data Sheet for all materials used on Chesapeake and Style Grain line processes that display the VOC % and HAPS % by weight. All required Method 24/24A results or manufacture's certificates of VOC batch content as supplied for materials containing VOCs.
2. Monthly throughput of printed plywood paneling products and calculation of VOC



emissions per 1000 square feet of printed plywood paneling products on the Chesapeake and Style Grain lines.

3. Fabric filter daily pressure differential device readings and any upsets, maintenance activities for upsets, visible emission checks, maintenance activities for reducing visible emissions, and any VEE conducted.

### **C. Plywood Paper Laminate Line**

1. Each fabric filter daily pressure differential device readings and any upsets, maintenance activities for upsets, visible emission checks, maintenance activities for reducing visible emissions, and any VEE conducted.
2. The monthly throughputs of grooved and non-grooved products, groover emission factor, and fabric filter control efficiency.

### **D. UV Plywood Products**

1. Annual production of UV Line plywood paneling products (thousands of sq ft), calculated monthly as the sum of each consecutive 12-month period.
2. Fabric filter daily pressure differential device readings and any upsets, maintenance activities for upsets, visible emission checks, maintenance activities for reducing visible emissions, and any VEE conducted.
3. Maintenance schedule, spare parts list, maintenance records of scheduled and unscheduled maintenance, any notifications for shut downs of control equipment which results in excess emissions for more than one hour, and training records.
4. Request by DEQ to reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and permittee's actions.

### **E. Cut to Size plywood Products**

Each fabric filter daily pressure differential device readings and any upsets, maintenance activities for upsets, visible emission checks, maintenance activities for reducing visible emissions, and any VEE conducted.

### **F. Woodhog**

Woodhog water mist flow checks, visible emission checks, maintenance activities for reducing visible emissions, any VEE conducted, and wood chip truck loading area checks with maintenance activities to correct noted problems.

### **Testing**

The permit requires VOC/HAPS content testing of materials when actual emissions are equal to

or exceed the specified permit limits. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

**Reporting**

Specific reporting requirements—None.

Other reporting requirements are outlined in the General Requirements section

**Streamlined Requirements**

A. The following Conditions for the 12/22/97 permit were not included in the Title V permit:

Condition 1: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.J.

Condition 8: Construction reports. All reports on the construction and the beginning of operations were accomplished during 1998.

Condition 10: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.R & V.

Condition 11: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.Q.

Condition 12: has part of the its requirements listed in T-5 permit boilerplate language of Part XI.F and rest listed in Part III.A.6.

Condition 15: Invalidation of permit for none construction within 18 months: All construction and operations began in 1998.

Condition 16: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.T.

Condition 17: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.L.

Condition 18: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.S.

B. The following Conditions for the 02/09/2000 permit were not included in the Title V permit:

Condition 1: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.J.

Condition 11: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.D.

Condition 12: Construction reports. All reports on the construction and the beginning of operations were accomplished during February 2000.

Condition 13: Invalidation of permit for none construction within 18 months: All construction and operations began in February 2000.

Condition 14: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.Q.

Condition 16: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.F.

Condition 19: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.R & V.

Condition 20: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.T.

Condition 21: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.L.

Condition 22: has all of the its requirements listed in T-5 permit boilerplate language of Part XI.S.

## **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

## **STATE ONLY APPLICABLE REQUIREMENTS**

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-40-180, *Toxic Pollutants*

9 VAC 5-40-140; *Odor*

## **FUTURE APPLICABLE REQUIREMENTS**

None identified

## **INAPPLICABLE REQUIREMENTS**

Chesapeake and Style Grain Lines--9 VAC 40 Chapter 40, Article 4, Emission Standards for General Process Operations. Rule 4-4 was written for General Processes not covered by a specific type process listed in 9 VAC 40 Chapter 40. 9 VAC 5-40-240.D states, "The provisions of this article DO NOT apply to affected facilities subject to other emissions standards in this part." Chapter 40, Article 35 was specifically written with a VOC emission standard for plywood paneling production. Since Rule 4-35 does not establish a PM standard nor reference Rule 4-4 applicability to plywood paneling production, there is no applicable PM standard for the Chesapeake and Style Grain plywood paneling lines.

Rule 4-4 also does not apply to the Echo Line or the UV Line.

(Only the Paper Laminate Line had no existing source rule or permit applicability. The Rule 4-4 PM standard had applicability for this Line when the groover generated PM.)

## **INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL 1-6	6 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
CL 1-9	9 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
SGL 1-8	8 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
EL 1-4	4 Natural Gas Ovens	9 VAC 5-80-720 C		3.5 MM Btu/hr each
EG-1	Emergency generator (natural gas)	9 VAC 5-80-720 C		20 KW/hr
FP-1	Emergency fire water pump. (diesel)	9 VAC 5-80-720 C		220 HP/hr

<sup>1</sup>The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

## **CONFIDENTIAL INFORMATION**

The permit did not submit a request for confidentiality. All portions of the Title V application are suitable for public view.

## **PUBLIC PARTICIPATION**

The proposed permit will be placed on public notice in the Virginian Pilot newspaper on 04/09/2000 to 05/09/2000.

Public comments: None

EPA comments:

May 9, 2000

Mr. Barry Halcrow  
Virginia Dept. of Environmental Quality  
Tidewater Regional Office  
5636 Southern Boulevard  
Virginia Beach, VA 23462

RE: Draft Operating Permit for Chesapeake Hardwood Products, Inc. [VA-60851]  
[AIRS 515500056]

Dear Mr. Halcrow:

We have reviewed Chesapeake Hardwood Products draft title V operating permit. In general, you have composed a comprehensive permit. We believe the following comments will make the permit even more effective. Our goal is that you issue a permit that meets all of the requirements of title V and 40 CFR part 70. Please include this letter as part of the official record for this permit. I understand that the public comment period for this permit closes on May 9, 2000.

The following comments identify the issues, the basis of the concern, and potential corrective changes, when appropriate.

### **OUR COMMENTS:**

1. Condition III.A.4: This condition establishes short-term and annual VOC emission limits for the Echo Line. For purposes of practical enforceability, you should amend this condition to indicate that annual emissions are determined on a consecutive 12-month basis.

DEQ response: Item addressed in Condition III.A.2--VOC throughput for consecutive 12-month basis listed. With no controls identified in the permit, VOC throughput equals VOC emissions. Periodic monitoring Condition III.B.3 also lists hourly and annual (consecutive 12-month basis) emissions to be calculated.

2. Condition III.B.1: This condition contains the monitoring requirements for the fabric filter for the Echo Line. The condition contains the following language: A defined upset for the differential pressure drop reading does not necessarily equate to an exceedance of the particulate matter limitation of this permit. Since the permit does not specify the criteria for

determining when an excursion does equate to an exceedance of the relevant limit, you should remove this sentence from these conditions. As it stands the permit language may be misleading and is not practically enforceable.

DEQ response: Sentence removed from each monitoring section. Periodic monitoring is designed to collect and record data to assess compliance status. If parametric monitoring can specify when values outside an established range is a standard violation, it should be noted in the permit. In this case, differential pressure drop readings can not identify a permit exceedance. A deviation from normal differential pressure drop levels shall require documentation of such and trigger an investigation with noted corrective actions taken for the deviation. By removing the sentence, the upsets remain credible evidence. Any excessive amount of deviations reported on the semi-annual periodic monitoring report could indicate a violation of good O&M practices.

3. Condition III.C.2 and 5 and Condition IV.C.1: These conditions contain the permittee's recordkeeping obligations for the Echo Line and Chesapeake and Style Grain Lines regarding VOC and HAP content of material used by the various lines. You should amend these conditions to should specify that the VOC and HAP content of the material is to be determined and certified using approved EPA test methodologies such as 40 CFR part 60, Appendix A EPA Reference Method 24 and 40 CFR part 63, subpart II.

DEQ revised response in DEC 2000 from proposed comments of 12/07/00: Item addressed in new Conditions III.B.3-7 (Monitoring) for Echo Line and Conditions IV.B.3-4 (Monitoring) for Chesapeake and Style Grain Lines. Method 24/24a for VOC and Method 311 for HAPS or manufacture's certificate of VOC/HAPS content as supplied will be used in place of MSDSs to determine VOC/HAPS content of materials when the actual emissions are equal to or exceed 50% of the specified VOC/HAPS emission limits in the permit.

4. General Comment: A number of conditions in the permit contain the permittee's recordkeeping for the various process lines and equipment. You should add items to these conditions requiring that records be kept identifying the relevant pollutant-specific emission factors (F-factors) relied upon for purposes of calculating actual emission rates and the equations used in these calculations.

DEQ response: Item addressed in the permit. Condition XI.M (Duty to Pay Permit Fees) requires calculations of the facility emissions each year. These calculations are subject to DEQ verification and approval of emission factors and equations used by the permittee.

5. General Comment: A number of conditions contain the permittee's recordkeeping requirements regarding visible emission checks. You should amend these requirements to clarify that the permittee must keep records of each visible emission check (and the parameters associated with each check.)

DEQ response: Item addressed in the permit. The VA T-5 permits have two sections. The first section identifies the specific periodic monitoring activities and recordkeeping requirements for each process or emissions unit. The second section contains general instructions for the facility. Condition XI.C (Recordkeeping and Reporting) in the General Conditions clearly identifies what items are required to be noted when periodic monitoring activities are conducted.

We welcome the opportunity to discuss your reactions and perspectives on these comments. You should prepare a written response to each of our comments and any comments received from the public. We expect that Chesapeake Hardwood Products proposed permit will reflect our comments and any discussions we have regarding the comments. We will determine the final acceptability of the proposed permit within 45 days of receiving the permit and response-to-comments document.

If you have any questions about this letter, please contact me at 215 814-2196 or via e-mail at Acampbell.dave@epamail.epa.gov. Thank you for the opportunity to review the draft permit. We hope this process results in an acceptable permit for this source.

Sincerely,

David Campbell, Environmental Engineer  
Air Protection Division

Proposed permit to EPA on: October 29, 2000

EPA e-mail comments on 12/7/2000: You have adequately addressed all of our other comments in our May 9, 2000 Letter except we are not satisfied with your response to our Comment No. 3 regarding the need for the use of EPA-approved test methods for the determination of VOC and HAP content of material used. We believe that reliance on EPA-test methods are the appropriate means for providing adequate periodic monitoring for the VOC and HAP emission limits provided in the permit.

David J. Campbell  
Air Protection Division  
U.S. EPA - Region III

DEQ response: Changed proposed T-5 permit according to revised response to Comment No. 3. in letter of May 9, 2000.

EPA OK to proposed permit given on: January 29, 2001

## **ATTACHMENT A: MINOR NSR PERMITS**

**12/22/1997 for Echo Line  
02/09/2000 for UV Line**